

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:	§	BANKRUPTCY NO. 24-51145 MMP
	§	
RIVER SUB, LLC	§	(Subchapter V Debtor)
	§	
DEBTOR	§	CHAPTER 11 PROCEEDING

MOTION FOR EXPEDITED HEARINGS ON THE DEBTOR'S FIRST DAY MOTIONS

NOW COMES River Sub, LLC, ("Movant") and submits this Motion for Expedited Hearing on the following motions:

- (A) *Emergency Motion for Entry of an Order (i) Authorizing, But Not Directing, Debtor to (a) Pay Prepetition Employee Wages, Salaries, Other Compensation and Reimbursable Employee Expenses and (b) Continue Compensation and Benefits Programs and (ii) Granting Related Relief;*
- (B) *Debtor's Emergency Motion for Entry of Order Authorizing Debtor to Maintain Pre-Petition Bank Accounts and Granting Related Relief; and*
- (C) *Debtor's Emergency Motion for Order Under 11 U.S.C. §§ 105(A) and 366 (I) Prohibiting Utility Companies From Altering or Discontinuing Service on Account of Prepetition Invoices, (II) Approving Deposit Account as Adequate Assurance of Payment, and (III) Establishing Procedures for Resolving Requests by Utility Companies for Additional Assurance of Payment. (the "First Day Motions")*

In support of the Motion to Expedite (the "Motion"), the Debtor respectfully states as follows:

1. On June 20, 2024 (the "Petition Date"), the Debtor commenced a case by filing a petition for relief under chapter 11 of the Bankruptcy Code (the "Chapter 11 Case").
2. Contemporaneously with the filing of this Motion to Expedite, Debtor filed the First Day Motions along with the *Declaration of Cathy Amato in Support of First Day Motions* (the "First Day Declaration") containing a more detailed description of the Debtor and its business, the

facts and circumstances leading up to the filing of the Debtor Chapter 11 Case, and the facts supporting the Motion, which is incorporated by reference in this Motion

3. Pursuant to § 105(a) of the Bankruptcy Code, “[t]he court may issue any order . . . that is necessary or appropriate to carry out the provision of this title.” Rule 9006 of the Federal Rules of Bankruptcy Procedure allows the Court to grant the relief requested herein. Debtor requests that the Court set an expedited hearing on the First Day Motion. Good and sufficient cause to exists to grant this Motion to Expedite.

4. **Certificate of Conference.** The undersigned has conferred or attempted to confer with the US Trustee’s office and is not aware of any opposition to the request for an expedited hearing.

5. **Time Estimate for Hearing:** 1 hour.

6. **Deadline for when hearing is needed:** As soon as the Court can accommodate the parties.

7. **Dates when all parties are available:** Debtor’s counsel is available June 24, 25 and 26, 2024.

WHEREFORE, the Debtor respectfully requests that the Court enter an Order setting an expedited hearing on the First Day Motions and granting such other relief as is just and proper.

Respectfully submitted June 20, 2024.

THE LAW OFFICES OF RAY BATTAGLIA, PLLC.
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By: /s/ Raymond W. Battaglia

Raymond W. Battaglia
Texas Bar No. 01918055

**PROPOSED ATTORNEYS FOR THE
DEBTOR IN POSSESSION**

CERTIFICATE OF SERVICE

On June 20, 2024 a true and correct copy of the foregoing document was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system, as set forth below. I further certify that it has been transmitted by first class mail to the parties on the attached exhibit.

/s/ Raymond W. Battaglia
Raymond W. Battaglia